

**BLACK & GERNGROSS<sub>PC</sub>**

ATTORNEYS AT LAW

JAMES J. BLACK, III  
FREDERICK J. GERNGROSS  
JEFFREY B. MICELI  
ALFRED RAUCH, III  
MARK W. DRASNIN\*

CLAUDIA PENTONY BLACK\*  
OF COUNSEL

Members of PA & NJ Bar  
\*Members of PA Bar only

April 17, 2020

Hon. Mitchell S. Goldberg  
U.S. Courthouse  
601 Market Street  
Room 7614  
Philadelphia, PA 19106

**Re: *Catlin Specialty Insurance Co. v. J.J. White, Inc., Sunoco, Inc., and Sunoco, Inc. (R&M), 14-cv-01255-MSG***

Dear Judge Goldberg:

Pursuant to your Order of April 3, 2020 in the above matter, the parties write this joint letter to provide the information requested by that Order.

**Trial Dates**

The parties propose the periods of October 5-15, 2020 or November 2-13, 2020.

**Remaining Discovery**

The only remaining discovery is the depositions (and updates of expert disclosures) of each party's expert witnesses. The expert for Catlin is Dr. Harrison in San Francisco, California. The experts for the Sunoco and JJ White are Dr. Rubin in Philadelphia, Pennsylvania and Dr. Natelson in Houston, Texas.

The deadline for expert discovery is July 20, 2020.

**Mediation**

Both parties believe that a mediation either before a private mediator or Magistrate Judge Rice would be fruitful after the completion of the deposition of experts, and thus request a mediation before trial. The parties are currently conferring regarding a mediator and will further advise the Court if and when they have reached agreement.

Hon. Mitchell S. Goldberg  
April 17, 2020  
Page 2

Should the Court need any additional information, the parties are available for a conference call with the Court and to respond to any questions or concerns the Court may have.

Very truly yours,

/s/ Lauren R. Mendolera

Patrick M. Tomovic  
Lauren R. Mendolera

**Harter Secrest & Emery LLP**  
*Lead Attorneys for Plaintiff/  
Counterdefendant Catlin Specialty  
Insurance Company*

/s/ Mark W. Drasnin

James J. Black, III  
Jeffrey B. Miceli  
Mark W. Drasnin

**Black & Gerngross, P.C.**  
*Attorneys for Defendant/Counterplaintiff,  
J.J. White, Inc. and Counterplaintiffs,  
Sunoco, Inc. and Sunoco, Inc. (R&M)*